

United States District Court  
for the District of Massachusetts

Shonnett Sisco,  
*Plaintiff,*

v.

Goodwin Procter LLP  
*Defendant.*

Civil Action No. 04-12564-DPW

**Joint Statement**

**Introduction**

The parties submit this Joint Statement under Local Rule 16.1 and the Court's Order, dated December 27, 2004, for the purposes of 1) preparing an agenda of matters to be discussed at the February 10, 2005, scheduling conference; 2) preparing a proposed pretrial schedule that includes a plan for discovery; 3) considering settlement; and 4) considering whether the parties will consent to trial by a magistrate judge.

**Proposed Pretrial Schedule**

1. Automatic disclosures to be completed by February 24, 2005.
2. All motions to join other parties or amend the pleadings to be filed on or before April 29, 2005.
3. Initial document requests and interrogatories to be exchanged on or after April 30, 2005, but no later than June 1, 2005.
4. All other written discovery and fact witness depositions shall be completed on or before October 1, 2005.

5. Experts must be disclosed on or before January 30, 2006. Rebuttal experts are to be disclosed by February 28, 2006. Expert depositions shall be completed on or before April 30, 2006.
6. All dispositive motions and motions for Summary Judgment shall be filed on or before May 31, 2006.
7. The parties request a pretrial conference on or after June 30, 2006, and should be ready for trial by July 30, 2006.
8. The parties agree that discovery shall be limited in accordance with LR 26.1(C), but that a party may request additional discovery in accordance with LR 26.2(B).

#### **LR 16.1(D)(3) Certificate**

Defendant's LR 16.1(D)(3) certificate shall be filed separately.

#### **Mediation**

The parties agree to mediate this claim. They believe that mediation may lead to a cost-efficient resolution of this matter.

#### **Trial by Magistrate**

The parties do not elect to a trial by magistrate judge.

02/02/2005 13:44 617-439-4207


SHEPHERD LAW GROUP

PAGE 04/04

Respectfully submitted,

Shonnett Sisco,

Pro Se,



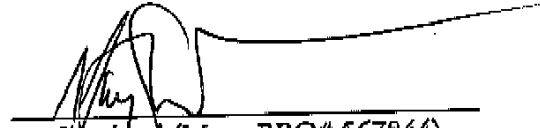
Shonnett Sisco  
26 Brookview Street  
Dorchester, Massachusetts 02124  
Telephone: 617.822.6932

Dated: February 2, 2005

Respectfully submitted,

Goodwin Procter LLP,

By its attorneys,



Jay Shepherd (Mass. BBO# 567844)  
Stephen B. Reed (Mass. BBO# 561949)  
Lurleen A. Manning (Mass. BBO# 655109)  
Shepherd Law Group, P.C.  
99 Summer Street, Suite 910  
Boston, MA 02110-2148  
Telephone: 617.439.4200  
Facsimile: 617.439.4207